This Track 1 Decision Document is marked "Draft" but is a final document signed by the agencies.

MIM Date 2/15/2005



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Dirk Kempthome, Governor Toni Hardesty, Director

November 8, 2004

Ms. Kathleen Hain, CERCLA Lead Environmental Restoration Program U.S. Department of Energy Idaho Operations Office 1955 Fremont Avenue Idaho Falls, Idaho 83401-1216

Re: Correction of previously signed Decision Statements for Track 1s

Dear Ms. Hain:

During a October 27, 2004 conference call, DOE identified several Track 1 decision statements that were signed by both EPA and DEQ over the last several months that differ in the nomenclature used to define the recommended status of the sites. Specifically, EPA recommended *No Action* at several sites while DEQ recommended *No Further Action* for these same sites. After further review of these documents, we have concluded that some of our previous recommendations were in error. This letter serves as official notice correcting these recommendations.

To clarify, DEQ recommends *No Action* for sites with no contamination source present, or for sites with a contamination source that currently poses an acceptable risk for unrestricted use. A *No Further Action* recommendation is made for sites with a contamination source or potential source present, but for which an exposure route is not available under current conditions. Although no additional remedial action is required at this time, current institutional controls (such as fencing and administrative controls that prevent or limit excavation/drilling into contaminated areas) must be maintained. After a remedial decision is made for these sites, they should be included in a CERCLA review performed at least every five years to ensure that site conditions used to evaluate the site have not changed and to evaluate the effectiveness of the *No Further Action* Decision. If site conditions or current institutional controls change, additional sampling, monitoring, or action will be considered.

On the basis of the above definitions, DEQ now recommends *No Action* under the FFA/CO for the following sites: Site-10, -17, -18, 21, -27, -28, -31, -32, -34, -37, -38, -40, -41, -42, -43, -44, and -47. However, note that Sites -18 and -38 are wells that must be secured and eventually closed and abandoned in accordance with Idaho Department of Water Resources regulations.

Ms. Kathleen Hain, Lead, CERCLA Program November 8, 2004 Page Two

DEQ continues to recommend *No Further Action* for Site-39. Although no live munitions have been identified at the site, the possibility exists for live munitions to be present mixed with the inert munitions that have been identified. Therefore, the site may pose an unacceptable risk to human health and the environment, if it were currently released for unrestricted use.

Please contact Margie English of my staff at (208) 373-0306 if you have questions about this letter.

Sincerely

Daryl F. Koch FFA/CO Manager

DK/ic

CC:

Nicholas Ceto, U.S. EPA Region 10, Richland, WA Dennis Faulk, U.S. EPA Region 10, Richland, WA Kathy Ivy, U.S. EPA Region 10, Seattle, WA Mark Shaw, DOE, Idaho Falls Margie English, DEQ, Boise, ID

SITE 028 TRACK 1 DECISION DOCUMENTATION PACKAGE, OU 10-08

DECISION DOCUMENTATION PACKAGE COVER SHEET

Prepared in accordance with

TRACK 1 SITES: GUIDANCE FOR ASSESSING LOW PROBABILITY HAZARD SITES AT THE INEEL

Site Description:

Canal Builder's Campsite

Site ID:

028

Operable Unit: 10-08

Waste Area Group: 10

I. SUMMARY – Physical description of the site:

Site 028 comprises a historical canal builder's campsite located along the canal between the Test Reactor Area (TRA) and the Nuclear Reactor Facility (NRF) off Lincoln Boulevard across from the old fire station at the INEEL. Observed surface debris includes empty black powder cans, toys, cookware, dishes, bottles, nails, weathered wood and a basalt igloo-like structure possibly used for black powder storage. Located near the campsite are mounds of disturbed soil and vegetation. A concentration of debris in the drainage canal is the remnant of the base camp used by canal builders in the early part of the twentieth century. The debris is scattered over an area approximately 50 ft by 50 ft.

This site was originally listed as part of an environmental baseline assessment in 1994 and identified as a potential new waste site in 1995. In accordance with Management Control Procedure-3448, Reporting or Disturbance of Suspected Inactive Waste Sites, a new site identification form was completed for this site. As part of the process, a field team wrote a site description and collected photographs and global positioning system (GPS) coordinates of the site (the GPS coordinates are The GPS coordinate system is listed as North American Datum 27, Idaho East Zone, State Plane Coordinates. The new site identification process also included a search and review of existing historical documentation.

Site 028 is located within the Landmine Fuse Burn Area, which encompasses approximately 20 acres west of Lincoln Boulevard. That portion of the INEEL was set aside by the U.S. Navy to test fire naval guns, conduct mass detonation tests, practice aerial bombing, and perform explosive material compatibility tests. The Landmine Fuse Burn Area was included in a 1996-97 INEEL Unexploded Ordnance (UXO) Removal Action. Removal included clearance of landmine remnants and fuses from surface and selected subsurface areas to 2 ft deep. Piles of landmine pressure plates, remnants of fuse packing crates, shipping rings for aerial bombs, and miscellaneous scrap were also removed. Following the cleanup effort, residual 2,4,6-Trinitrotoluene (TNT) and Royal Demolition Explosive (RDX) remained in the soil. Although the canal builder's campsite is located in the Landmine Fuse Burn Area, this Track 1 addresses only the canal builder's campsite debris. The Landmine and Fuse Burn Area is currently being evaluated under the WAG 6 and 10 Operable Unit (OU) 10-04 Comprehensive Remedial Investigation/Feasibility Study (RI/FS).

Prior to ordnance cleanup efforts, INEEL Cultural Resources Management personnel completed an archaeological survey to identify and evaluate cultural properties within the area of potential effects for the ordnance cleanup activities. It was determined that the canal and campsite artifacts have historic and cultural resource value. The canal (constructed ca.1910) was determined to be an original tributary of the Big Lost River irrigation system dug as part of the Land Reclamation Act of 1902. Because of the nature of artifacts found there, the site is believed to have been a base camp for canal builders.

DECISION RECOMMENDATION

II. SUMMARY - Qualitative Assessment of Risk:

There is insufficient information to determine whether a source of contamination exists at this site; however, there is no empirical, circumstantial, or other evidence of contaminant migration. INEEL Cultural Resources Management interviews and written reports provided historical and current information about the canal builder's campsite and Landmine Fuse Burn Area activities; therefore, the reliability of information provided in this report is high.

Field investigations revealed no visual evidence of hazardous substances that may present a danger to human health or the environment; however, this is not sufficient to determine if contaminants are present at levels requiring action. Lack of field screening or sample data make the overall qualitative risk for this site unknown.

III. SUMMARY - Consequences of Error:

False negative error:

The possibility of contamination levels at this site being above risk-based limits is low. Further field investigations are needed to better characterize the debris and surface soil for evidence of contamination or migration. If no further action is taken there is a potential for contamination which may present a higher than anticipated risk to human health and the environment.

False positive error:

If further action were completed at a low risk site, funds expended may exceed the environmental benefit. Surface soil sampling and analysis for organic compounds, metals, radionuclides, and other hazardous constituents would be needed to verify the presence or absence of contamination.

IV. SUMMARY - Other Decision Drivers:

INEEL Cultural Resource Management personnel determined that this site met the requirements of a cultural resource. Prior to completing further action at this site Cultural Resources personnel would need to be contacted. Any further action performed in this area would be conducted under Idaho State Historic Preservation Office (SHPO) guidance.

Recommended Action:

It is recommended that this newly identified site continue under the Track 2 process to determine the extent and concentration of potential contaminants that may be present. Field investigations and historical process knowledge are limited and further characterization is needed. Although the site is located in a remote, abandoned area and visual evidence indicates it is unlikely that hazardous or radioactive materials were generated or disposed of at this site, there is insufficient evidence to determine whether contaminants are present, requiring further investigation.

Signatures: Vencollably for # Pages:	16 Date: August 1, 2001
Prepared By: Marilyn Paarmann, WPI	DOE WAG Manager:
Approved By: Mill Tolk 9-30-04	Independent Review: Swy Changer 1-20-09

DECISION	STATEMENT
(DOI	ERPM)

Date Received: 1/17/05

Disposition:

5 ite 028, the canal builder composte. is classified as noactive. This determination will be recorded in the site dutabase and listed in the 2005

[MEEL Integrated 5-Year Review

Date: 1/14/65 # Pages: 1011

Name: 16a 14 leen Hain Signature: Nathlem 9 Hain

DECISION STATEMENT (EPA RPM)	site	028

Date Received:

Disposition:

2 Investigation is warrented. Photographs and supporting information suggests this site should be classified as a no-action site.

Date:	9-23-04	# Pages:
Name:	Dennis Faulle	Signature:

DECISION STATEMENT (IDEQ RPM)
Date Received:
Disposition:
Site 028
Site 028 is a historic canal builder's campsite located along the abandoned canal between TRA and NRF west of Lincoln Boulevard. This site also lies within the boundary of the Land Mine Fuse Burn Area but this site description only deals with the canal builder's debris in an area that is about 50 feet by 50 feet. The debris includes 'empty lock powder cans, toys, cookware, dishes, bottles, nails, weathered wood and a basalt igloolike structure possibly used for black powder storage." There are mounds of disturbed soil near the campsite. This site was evaluated by INEEL Cultural Resources Management personnel during an archeological survey and was determined to have historic and cultural resource value. It appears this canal was constructed in about 1910 as part of the Land Reclamation Act of 1902. Although the Track 1 recommends investigating the site as a Track 2, the State believes sufficient information is available to warrant a No Further Action. The description provided does not suggest the potential presence of contaminants other than degraded black powder at this nearly 100-year-old site.

Pages:

Signature:

I. Hack

Date:

Name:

PROCESS/WASTE WORKSHEET SITE ID: 028		PROCESS: Canal Builder's Campsite WASTE: Domestic and Canal Building Debris
Col 1 Processes Associated With This Site	Col 2 Waste Description & Handling Procedures	Col 3 Description & Location of any Artifacts/Structures/Disposal Areas Associated with this Waste or Process
Historic base camp used by canal	Waste was abandoned by canal builders during construction of the canal in the	Artifact: Domestic and Canal Building Debris
builders during construction of canal/irrigation	early part of the twentieth century.	Location: Along the canal between TRA and NRF, off Lincoln Boulevard, across from the old fire station.
system developed in the early part of		Description: The site is located between a large canal and a natural drainage channel. Artifacts are widely dispersed in
(ca. 1910-1920).		general, but a dense concentration of items is present within the drainage channel. Some of the materials are
		burned and nearly all are broken. Several smaller
		drainage channel including a pile of $100 \times 4 = 10$, a
		multitude of nails located ~55 yards east of the canal, and a low igloo-like structure (5 ft in diameter) made of basalt
		cobbles and associated with black powder cans located
		approximately 38 yards east of the canal. Other artifacts noted on the site include; hundreds of hole-in-top cans.
		hundreds of glass fragments, horseshoe nails and
		horseshoes, various types of utensils, stove pipe sections, black powder cans, blasting cap cans, a kerosene lantern.
		mason jars, porcelain mason jar lids and tin tops, syrup
		cans, butter tin, buckles, hair pins, shell buttons, barrel staves tobacco tins milled woods tin plate 8-in tin tube
		with blue enamel exterior, two ½ gallon tin pails with
		handles, spice jars, and a hundred or more ceramic
		fragments.

Draft

CONTAMINANT WORKSHEET					
SITE ID: 028					
PROCESS: (Col 1) Canal Builder's Campsite	ampsite	WASTE: (Col 2) Domestic and Canal Building Debris	mestic and Canal	Building Debris	
Col 4 What Known/Potential Hazardous Substance/Constituents are Associated with this Waste or Process?	Col 5 Potential Sources Associated with this Hazardous Material	Col 6 Known/Estimated Concentration of Hazardous Substances/	Col 7 Risk-based Concentration	Col 8 Qualitative Risk Assessment (hi/med/low)	Col 9 Overall Reliability (high/med/low)
None	Soil	Unknown	AN	Med	High

NA = Not applicable

Question 1.	What are the waste generation proces	ses, locations, and	dates of operation	associated
with this sit	e?			

Site 028 is a historic canal builder's campsite containing black powder cans, buckets, toys, cookware, nails, weathered wood, and other types of domestic and canal building debris. The INEEL Cultural Resource Management determined that the site has likely existed since the early part of the twentieth century (ca. 1910-20). The site is located within the boundaries of the INEEL and resides along the canal between TRA (one mile away) and NRF (two miles away) across from the old fire station. The debris is scattered over an area approximately 50 ft by 50 ft.

Block 2 How reliable are the information sources? X High _Med _Low (check one) Explain the reasoning behind this evaluation.

Interviews with INEEL Cultural Resource Management and Environmental Restoration Environmental Safety and Health (ER ES&H) personnel revealed that the site is a historic canal builder's campsite. The materials found at the site include both domestic trash and canal construction materials.

Block 3 Has this INFORMATION been confirmed? \underline{X} Yes _No (check one) If so, describe the confirmation.

This was confirmed by an interview with INEEL Cultural Resource Management personnel, their written report, and photographs of the site.

No available information	[]	Analytical data	[]
Anecdotal	[X] 5,7	Documentation about data	ĨÌ
Historical process data	[X] 2,6	Disposal data	ĬĬ
Current process data	[1	Q.A. data	įj
Photographs	[X] 3	Safety analysis report	[]
Engineering/site drawings	[]	D&D report	ĨÌ
Unusual Occurrence Repor	t []	Initial assessment	[X] 4
Summary documents	[]	Well data	[]
Facility SOPs	[]	Construction data	įj
OTHER	ſŢ		

Question 2.	What are the dispe	osal processes,	locations,	and dates o	f operation	associated	with this
site? How v	was the waste disp	osed?					

Based on the types of artifacts found at Site 028, the INEEL Cultural Resource Management personnel determined that it is a historic resource - a canal builder's base camp dating from the 1910-1920's. The debris found scattered within the area includes both domestic and canal construction materials. The site is located within the boundaries of the INEEL and is situated along the canal between TRA and NRF across from the old fire station.

Block 2 How reliable are the information sources? \underline{X} High $\underline{\hspace{0.1cm}}$ Med $\underline{\hspace{0.1cm}}$ Low (check one) Explain the reasoning behind this evaluation.

INEEL Cultural Resources personnel confirmed the historical timeframe and cultural resource value of this site, the processes involved, and the estimated age of the debris.

Block 3 Has this INFORMATION been confirmed? \underline{X} Yes _No (check one) If so, describe the confirmation.

INEEL Cultural Resources personnel were involved in the site investigation prior to removal of the ordnance material in the area and prepared a preliminary report. Photographs and site investigations confirm the type of domestic and canal building debris present at the site.

No available information	[]	Analytical data	[]
Anecdotal	[X] 5,7	Documentation about data	ĪĴ
Historical process data	[X] 2,6	Disposal data	ĪΪ
Current process data	[]	Q.A. data	ĹĴ
Photographs	[X] 3	Safety analysis report	ĨĨ
Engineering/site drawings	[]	D&D report	ĨĨ
Unusual Occurrence Report	rt []	Initial assessment	[X] 4
Summary documents	ĨĨ	Well data	ĨĨ
Facility SOPs	ij	Construction data	ii
OTHER	įį		• •

Question 3.	Is there evidence that a source exists at this site?	If so, list the sources and describe
the evidence	9.	

There is insufficient evidence to determine whether a source exists at this site without further investigation.

The potential source of contamination for organics, metals, radionuclides or other hazardous constituents from the domestic or canal building debris cannot be estimated without further field screening or sampling. Vegetation appears to be well established and there is no visual evidence of soil discoloration or staining.

Block 2 How reliable are the information sources? _ High \underline{X} Med _Low (check one) Explain the reasoning behind this evaluation.

Interviews were conducted with INEEL Cultural Resources personnel confirming the types of debris and physical condition of the site. Photographs of the site confirmed the presence and type of debris.

Block 3 Has this information been confirmed? __Yes \underline{X} No (check one) If so, describe the confirmation.

No available information Anecdotal Historical process data Current process data Photographs Engineering/site drawings Unusual Occurrence Report Summary documents Facility SOPs	[] [X] 5,7 [X] 2,6 [] [X] 3 [] []	Analytical data Documentation about data Disposal data Q.A. data Safety analysis report D&D report Initial assessment Well data Construction data	[] [] [] [] [] [X] 4 []
OTHER	ii		.,

Question 4	is there emp	nirical, circumstantial	, or other evidence of	migration? If so	what is it?
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There is no evidence of migration. Site investigations reveal no visual evidence of stained or discolored soil with the exception of the small burned area.

The potential for contaminant migration for organics, metals, radionuclides or other hazardous constituents from the domestic debris or canal construction materials cannot be estimated without further field screening and sampling; however there is no known evidence that these constituents would be present at this site.

Block 2 How reliable are the information sources? \underline{X} High \underline{Med} Low (check one) Explain the reasoning behind this evaluation.

Site inspections and recent photographs of the area show that vegetation appears to be well established and there is no visual appearance of stained soil.

Block 3 Has this information been confirmed? ___ Yes _X_No (check one) If so, describe the confirmation.

No available information	[]	Analytical data	[]
Anecdotal	[X] 5,7	Documentation about data	ij
Historical process data	[X] 2,6	Disposal data	ίi
Current process data	֓֞֝֝֓֓֓֓֓֓֓֓֓֓֓֓֓֓֓֓֓֓֓֓֓֓֓֓֓֓֓֓֓֓֓֓֓֓	Q.A. data	ii
Photographs	[X] 3	Safety analysis report	ίi
Engineering/site drawings	Ϊĵ	D&D report	ii
Unusual Occurrence Repor	tří	Initial assessment	ii
Summary documents .	ii	Well data	ři
Facility SOPs	ří	Construction data	ii
OTHER	ii		

Question 5. Does	s site operating or disposa	al historical information	allow estimation o	of the pattern of
potential contami	ination? If the pattern is e	expected to be a scatteri	ng of hot spots, w	hat is the
expected minimu	m size of a significant hot	t spot?		

There is no expected pattern of contamination for this site; however lack of field screening and sampling makes it difficult to estimate. The material is generally considered domestic or construction in nature. The pattern of potential contamination for organics, metals, radionuclides or other hazardous constituents from this debris cannot be estimated without further field screening or sampling. No hot spots are expected in the area.

Block 2 How reliable are the information sources? _High \underline{X} Med _Low (check one) Explain the reasoning behind this evaluation.

Site investigations gave no indication that the debris left by the canal builders contained anything that might cause potential contamination. Photographs indicate that the soil is not stained or discolored, and vegetation near the debris appears to be well established.

Block 3 Has this information been confirmed? __Yes \underline{X} No (check one) If so, describe the confirmation.

No available information	[]	Analytical data	[]
Anecdotal	[X] 5,7	Documentation about data	ij
Historical process data	[X] 2,6	Disposal data	ĪĴ
Current process data	ĪĪ	Q.A. data	įį
Photographs	[X] 3	Safety analysis report	ij
Engineering/site drawings	<u>֡</u> ֝֞֝֞֝֞֝֞֝֞֝֡	D&D report	[X] 4
Unusual Occurrence Repor	rt []	Initial assessment	Ī 1
Summary documents	[X] 1	Well data	ίi
Facility SOPs	Ĺ)	Construction data	ĨĨ
OTHER	ĪĴ		

Question 6. Es	stimate the length,	width, and depth of	the contaminated	region. What is th	e known or
estimated volu	me of the source?	If this is an estima	ted volume, explai	n carefully how the	estimate :
was derived.					

Site investigations and photographs indicate that the debris covers an area of about 50 ft by 50 ft.

The debris appears to be domestic in nature or from canal building activities, and likely poses no potential hazards. However, this cannot be confirmed without further field screening or sampling.

Block 2 How reliable are the information sources? _High \underline{X} Med _Low (check one) Explain the reasoning behind this evaluation.

The presence or absence of potential hazardous constituents cannot be confirmed with existing information.

Block 3 Has this INFORMATION been confirmed? Yes \underline{X} No (check one) If so, describe the confirmation.

No available information	[]	Analytical data	[]
Anecdotal	[X] 7	Documentation about data	ii
Historical process data	[1]	Disposal data	Ϊį
Current process data	ĨĬ	Q.A. data	ΪĬ
Photographs	îX1 3	Safety analysis report	ii
Engineering/site drawings	Ī1 [*]	D&D report	ii
Unusual Occurrence Repo		Initial assessment	[X] 4
Summary documents	[X] 1	Well data	ΪĨ
Facility SOPs	ΪΊ	Construction data	ří
OTHER	ři		

Question 7. What is the known or estimated quantity of hazardous substance/constituent at this source? If the quantity is an estimate, explain carefully how the estimate was derived.						
Block 1 Answer:						
The estimated quantity of hazardous substances/constituents at this site is unknown because current site investigations do not sufficiently identify a source of contamination being present. Further field screening or sampling is needed to estimate the quantity of potential hazardous constituents.						
Block 2 How reliable are the information sources? _High X Med _Low (check one) Explain the reasoning behind this evaluation.						
Site investigations and photographs are not sufficient to identify or confirm a source of contamination present at this site.						
Block 3 Has this INFORMATION been confirmed? _Yes X No (check one) If so, describe the confirmation.						
Block 4 Sources of Information [check appropriate box (es) & source number from reference list]						
No available information [] Analytical data [] Anecdotal [X] 7 Documentation about data [] Historical process data [] Disposal data [] Current process data [] Q.A. data [] Photographs [X] 3 Safety analysis report [] Engineering/site drawings [] D&D report [] Unusual Occurrence Report [] Initial assessment [] Summary documents [X] 1 Well data [] Facility SOPs [] Construction data [] OTHER						

Question 8.	Is there evidence that this hazardous substance/constituent is present at the source as
it exists tod	ay? If so, describe the evidence.

Current evidence is not sufficient to identify the presence of any hazardous substance or constituent at this site. No field screening or sampling has been conducted for organics, metals, radionuclides, or other hazardous constituents to confirm the presence or absence of contaminants. Given the length of time since the debris was discarded at this site, exposure to weathering processes could reduce any likelihood that contaminants would be present today at levels above risk-based limits; however, field investigations and soil sampling are needed to confirm the possible contamination at this site, and whether concentrations are above acceptable limits. There is no visual evidence of soil discoloration or staining and the vegetation appears to be well established.

Block 2 How reliable are the information sources? _High \underline{X} Med _Low (check one) Explain the reasoning behind this evaluation.

This evaluation is based on historical process information, site visitations, and photographs of the area.

Block 3 Has this INFORMATION been confirmed? Yes X No (check one) If so, describe the confirmation.

Other hazardous constituents cannot be confirmed with existing information.

No available information	[]	Analytical data	[]
Anecdotal	[X] 5,7	Documentation about data	Ü
Historical process data	[X] 2,6	Disposal data	ĨĨ
Current process data	[]	Q.A. data	ΪĨ
Photographs	[X] 3	Safety analysis report	ĨĨ
Engineering/site drawings	ĪĪ	D&D report	ři
Unusual Occurrence Repo		Initial assessment	[X] 4
Summary documents	[X] 1	Well data	ĨĨ
Facility SOPs	[1]	Construction data	ίi
OTHER	ĪĪ		

REFERENCES

- 1. DOE, 1992, <u>Track 1 Sites: Guidance for Assessing Low Probability Sites at the INEL</u>, DOE/ID-10390 (92), Revision 1, U.S. Department of Energy, Idaho Falls, Idaho, July.
- 2. Interviews with Environmental Baseline Assessment team members, February 6-7, 2001.
- 3. Photographs of Site 028: PN99-465-1-2,3,4,5,6,7,8,9.
- 4. FY1999 WAG 10 Newly Identified Sites, Volumes I and II.
- 5. Interview with Brenda Ringe Pace, INEEL Cultural Resources Management (2/7/01).
- 6. Cultural Resource Investigation Preliminary Report 1996.
- 7. Memorandum from Tom Haney re: Landmine and Fuse Burn Area, 3/7/01.

